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April 24, 2023

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

4/24/2023
(1) Ms. Garbar will be
opposed + be
able to attend
(2) It would be
a good front
(3) Your response
will be
5/10/23
at 10:30 AM

Re: Lester Pearson v. City of New York, et al.,
22-cv-10669 (CM)

Dear Justice McMahon:



I represent the plaintiff Lester Pearson in the above referenced matter. I write this letter with the consent of my adversary to request that the court conference currently scheduled for May 4, 2023, be adjourned to May 18, 22, 25, or any other day that is suitable for the court. I make this request for as a solo practitioner I have a final pretrial conference scheduled on May 4, 2023, with jury selection scheduled to start on May 9, 2023, in the Queens County Supreme Court for the case of *Orlando Rios v. Academy Bus Lines*, et al., Index No. 717076/2017 (Court printout annexed).

Additionally, I request a 14-day extension to respond to the defendant's motion to dismiss, which my adversary has also consented. I would also like to request permission to add Desiree Garbar, Esq. as an attorney authorized to file papers and make appearances in this matter. While Ms. Garbar is not an employee of my firm, Mr. Pearson has met with her and agreed to allow her to assist me in this matter. Ms. Garbar is an experienced attorney who is admitted to practice in the Southern District of New York, has clerked for Federal Justices, and tried cases for Skadden Arps before she decided to step back from the full time practice of law.

Finally, I also request five additional pages for the plaintiff's memorandum in opposition to the defendant's motion to dismiss. The defendants have moved to dismiss all 13 causes of action, and incidents involving Mr. Pearson span over 23 years, which necessitates more space to address the matter fully.

Thank you for your consideration. This is the first time the plaintiff has requested an extension of time to respond.

Sincerely,

/s David Broderick
David Broderick

